

HARRY M. LIGHTSEY III
General Attorney

Southern Bell Telephone
and Telegraph Company
c/o Marshall M. Criser III
Suite 400
150 So. Monroe Street
Tallahassee, Florida 32301
Phone (305) 530-5558

January 21, 1992

ORIGINAL
FILE COPY

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Docket No. 910022-TL - Bradford County EAS

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Limited Protest of Certain Portions of Order No. 25566, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTD _____
- EAG _____
- ESG 1 ^{cc:} W/M
- ESA 6
- CAF _____
- EDD _____
- ESP 1
- YLF _____
- CF _____

Enclosures

All Parties of Record
A. M. Lombardo
Harris R. Anthony
R. Douglas Lackey

RECEIVED & FILED

KF
FPSC-BUREAU OF RECORDS

Sincerely yours,

Harry M. Lightsey, III (copy)
Harry M. Lightsey III

DOCUMENT NUMBER-DATE

00758 JAN 21 1992

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 910022-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *21* day of *January*, 1992
to:

Charles Murphy
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Richard H. Brashear
ALLTEL Florida, Inc.
Post Office Box 550
Live Oak, Florida 32060

Sam Wahlen
Central Telephone Company
Post Office Box 2214
Tallahassee, Florida 32316

David B. Erwin, Esq.
Mason, Erwin & Horton, PA
1311-A Paul Russel Road, Suite 101
Tallahassee, Florida 32301

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, Florida 32301

Henry M. Lightsey (cs)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution by Bradford County) Docket No. 910022-TL
Commission requesting extended area)
service within Bradford County, Union) Filed: 1/21/92
County, and Gainesville.)
_____)

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
LIMITED PROTEST OF CERTAIN PORTIONS OF ORDER NO. 25566**

COMES NOW BellSouth Telecommunications, Inc., d/b/a/
Southern Bell Telephone and Telegraph Company ("Southern Bell" or
"Company"), pursuant to Rule 25-22-09(4), Florida Administrative
Code, and files its Limited Protest of Certain Portions of Order
No. 25566.

1. On January 6, 1992, the Commission issued Order No. 25566 directing Southern Bell, ALLTEL Florida, Inc., and Central Telephone Company of Florida to implement an alternative toll plan for Bradford County, Union County and Gainesville.
2. Order No. 25566 additionally states that the Commission "shall approve Southern Bell's request that any revenue reduction be applied to its EAS offset amount, to the extent that there is any actual revenue reduction after stimulation." p. 7
3. Southern Bell respectfully protests that portion of Order No. 25566 quoted above on the basis that this issue was not properly before the Commission at the time of its decision and that this issue should be considered within Docket No. 880069-TL, which is where the "EAS offset amount" has been reserved.

DOCUMENT NUMBER-DATE
00758 JAN 21 1992
FPSC-RECORDS/REPORTING

4. The decision on this matter was made at the December 3, 1991, Agenda Meeting of the Commission. The Staff Recommendation with regard to this matter did not contain any issue that concerned the application of any revenue offset against the amounts reserved in Docket No. 880069-TL. On information and belief, the transcript of the December 3, 1991, Agenda Meeting will reflect that the Commission did discuss the revenue offset but only in the context of some later decision. Nevertheless, both the vote sheet and Order No. 25566 set forth the direction that any revenue offset will be applied after taking into account the affect of any stimulation of calling as a result of the alternative toll plan. Southern Bell believes that the vote sheet and the Order are to that extent in error.

5. Southern Bell does not wish to protest any of the substantive decisions which Order No. 25566 reflects. Southern Bell is moving to implement the alternative toll plan within the time frames directed in the Order. However, the Commission rules require that any reconsideration of a proposed agency action must be accomplished through filing a protest rather than a motion for reconsideration. Further, Southern Bell does not wish at this time to protest any decision with regard to whether any revenue reduction should or should not be applied after stimulation. Southern Bell only wishes to request that this matter be

considered at the time it applies for any such offset in Docket
No. 880069-TL

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

Harris R. Anthony (02)
HARRIS R. ANTHONY
General Attorney-Florida
c/o Marshall M. Criser III
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 530-5555

Harry M. Lightsey, III (02)
HARRY M. LIGHTSEY III
General Attorney
c/o Marshall M. Criser III
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 530-5558